

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree, with each other and with other persons known and unknown to the Grand Jury, to possess with intent to

distribute, and to distribute, marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the offense charged in this Count involved 1,000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vii) applies to this Count.

It is further alleged that, with respect to this Count, 1,000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, are attributable to, and were reasonably foreseeable by, (1) MICHAEL GORDON, and (2) DAGOBERTO OLEA. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vii) applies to defendants (1) MICHAEL GORDON, and (2) DAGOBERTO OLEA.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO: (Title 31, United States Code, Section 5324(a)(3) – Structuring)**

The Grand Jury charges that:

On or about the dates set forth below, at Roslindale, Massachusetts, Fields Corner, Massachusetts, and elsewhere in the District of Massachusetts, and elsewhere,

(1) MICHAEL GORDON,

defendant herein, did knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, cause and attempt to cause a domestic financial institution to fail to file a report required under section 5313(a) of Title 31, and any regulation prescribed under any such section, and did so while violating another law of the United States and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

<b>Date</b>	<b>Bank</b>	<b>Account # (Last 4)</b>	<b>Location</b>	<b>Amount</b>	<b>Type of Transaction</b>
July 2, 2012	Bank of America	4679	Fields Corner, MA	\$6,000	Deposit
July 2, 2012	Bank of America	4679	Roslindale, MA	\$6,000	Deposit

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d)(2) and Title 31, Code of Federal Regulations, Part 103.

**COUNT THREE: (Title 31, United States Code, Section 5324(a)(3) – Structuring)**

The Grand Jury charges that:

On or about the dates set forth below, at Uphams Corner, Massachusetts, and elsewhere in the District of Massachusetts, and elsewhere,

(1) MICHAEL GORDON,

defendant herein, did knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, cause and attempt to cause a domestic financial institution to fail to file a report required under section 5313(a) of Title 31, and any regulation prescribed under any such section, and did so while violating another law of the United States and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

<b>Date</b>	<b>Bank</b>	<b>Account # (Last 4)</b>	<b>Location</b>	<b>Amount</b>	<b>Type of Transaction</b>
April 29, 2013	Bank of America	4679	Uphams Corner, MA	\$6,500	Deposit
April 29, 2013	Bank of America	4679	Uphams Corner, MA	\$5,000	Deposit

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d)(2) and Title 31, Code of Federal Regulations, Part 103.

**FORFEITURE ALLEGATIONS**

**(Title 21, United States Code, Section 853,  
Title 31, United States Code, Section 5317 and Title 28, United States Code, Section 2461)**

The Grand Jury further alleges that:

1. Upon conviction of the offense alleged in Count One of this Indictment,

(1) MICHAEL GORDON,

(2) DAGOBERTO OLEA, and

(3) ANDREAN JAGGON,

defendants herein, shall forfeit to the United States, jointly and severally, pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense, including but not limited to the following:

- (a) the real property located at 4 Garden Street, Randolph, Massachusetts, including all buildings, appurtenances and improvements thereon, more particularly described in a Quitclaim Deed recorded at Book 31639, Page 267 at the Norfolk County Registry of Deeds;
  - (b) the real property located at 11561 NW 36<sup>th</sup> Street, Coral Springs, Florida, including all buildings, appurtenances and improvements thereon, more particularly described in a Warranty Deed recorded at Book 48668, Page 1908 at the Broward County Registry of Deeds;
  - (c) the real property located at 5665 NW 88<sup>th</sup> Terrace, Coral Springs, Florida, including all buildings, appurtenances and improvements thereon, more particularly described in a Warranty Deed recorded at Book 48856, Page 1530 at the Broward County Registry of Deeds;
  - (d) the real property located at 1565 SW Paar Drive, Port St. Lucie, Florida, including all buildings, appurtenances and improvements thereon, more particularly described in a Quit Claim Deed recorded at Book 3515, Page 284 at the Saint Lucie County Registry of Deeds; and
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- (e) a money judgment in the amount of approximately \$1,000,000 derived by the defendants from the distribution of controlled substances from in or about January 2012 through in or about October 16, 2014.

2. Upon conviction of the offenses alleged in Counts Two and Three of this Indictment,

(1) MICHAEL GORDON,

defendant herein, shall forfeit to the United States, pursuant to Title 31, United States Code, Section 5317, all property, real or personal, involved in the offenses and any property traceable to such property, including but not limited to at least \$23,500 in United States currency.

3. If any of the property described in Paragraphs 1 and 2, above, as a result of any act or omission of any defendants –

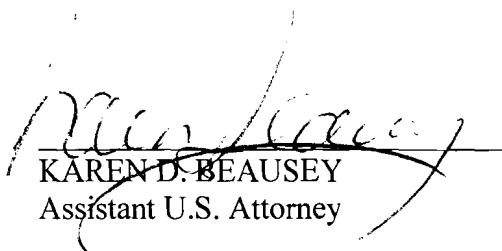
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States Code, Section 5317(c)(1)(C) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the property described in subparagraphs (a) through (e) of this paragraph.

All pursuant to Title 21, United States Code, Section 853, Title 31, United States Code, Section 5317 and Title 28, United States Code, Section 2461.

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
KAREN D. BEAUSEY  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS; October 16, 2014

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK

3:37P